

## REMARKS

### I. Introduction

With the cancellation herein without prejudice of claims 21 and 23, claims 14 to 20, 22, and 24 to 26 are pending in the present application. Claim 14 has been amended herein without prejudice to include the features of canceled claims 21 and 23. In view of the foregoing amendments and the following remarks, it is respectfully submitted that all of the presently pending claims are allowable, and reconsideration is respectfully requested.

Applicants note with appreciation the acknowledgment of the claim for foreign priority and the acknowledgment that all certified copies of the priority documents have been received.

### II. Rejection of Claims 14 to 17, 19 to 22, 24, and 25 Under 35 U.S.C. § 102(b)

Claims 14 to 17, 19 to 22, 24, and 25 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 3,125,078 (“Reiners”). As an initial matter, claim 21 has been canceled herein without prejudice, thereby rendering moot the present rejection with respect to claim 21. It is respectfully submitted that Reiners does not anticipate the present claims for at least the following reasons.

To anticipate a claim, each and every element as set forth in the claim must be found in a single prior art reference. Verdegaal Bros. v. Union Oil Co. of Calif., 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Furthermore, “[t]he identical invention must be shown in as complete detail as is contained in the . . . claim.” Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). That is, the prior art must describe the elements arranged as required by the claims. In re Bond, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990).

Claim 14, as presented, relates to a fuel-injection system for the direct injection of fuel into a combustion chamber of an internal combustion engine, including, *inter alia*, the features that the fuel lines form at least one fuel-line array of at least two fuel lines hydraulically connected in series, the fuel-line array supplying fuel to at least two fuel injectors, and *at least two fuel-line arrays are hydraulically positioned in parallel*.

Reiners does not identically disclose, or even suggest, all of the claimed features of claim 14, as presented. Indeed, the Office Action states that “Reiners does not expressly disclose the parallel fuel array structure of applicant’s claims.” (Office Action, pp. 5 and 6). Thus, Reiners does not identically disclose, or even suggest, the feature that *at least two fuel-line arrays are hydraulically positioned in parallel*, as provided for in the context of claim 14, as presented.

Accordingly, Reiners does not identically disclose, or even suggest, all of the features included in claim 14, as presented. As such, it is respectfully submitted that Reiners does not anticipate claim 14.

As for claims 15 to 17, 19, 20, 22, 24, and 25, which ultimately depend from and therefore include all of the features included in claim 14, it is respectfully submitted that Reiners does not anticipate these dependent claims for at least the same reasons more fully set forth above.

In view of all the foregoing, withdrawal of this rejection is respectfully requested.

### **III. Rejection of Claim 18 Under 35 U.S.C. § 103(a)**

Claim 18 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Reiners and U.S. Patent No. 6,807,946 (“Koseki et al.”). It is respectfully submitted that the combination of Reiners and Koseki et al. does not render unpatentable the presently pending claim for at least the following reasons.

In order for a claim to be rejected for obviousness under 35 U.S.C. § 103(a), the prior art must teach or suggest each element of the claim. See Northern Telecom, Inc. v. Datapoint Corp., 908 F.2d 931, 934 (Fed. Cir. 1990), cert. denied, 111 S. Ct. 296 (1990); In re Bond, 910 F.2d 831, 834 (Fed. Cir. 1990). In addition, as clearly indicated by the Supreme Court, it is “important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the [prior art] elements” in the manner claimed. See KSR Int’l Co. v. Teleflex, Inc., 127 S. Ct. 1727 (2007). Further, the Supreme Court in KSR noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit. M.P.E.P. §2143.

Claim 18 ultimately depends from claim 14, as presented. As more fully set forth above, Reiners does not disclose, or even suggest, the feature that *at least two fuel-line arrays are hydraulically positioned in parallel*. Further, since all the

Figures of Koseki et al. merely indicate a single delivery pipe (2A to 2G), Koseki et al. also do not disclose, or even suggest, the feature that *at least two fuel-line arrays are hydraulically positioned in parallel* and thus, fail to cure this critical deficiency.

Accordingly, it is respectfully submitted that the combination of Reiners and Koseki et al. does not disclose, or even suggest, all of the features included in claim 14, from which claim 18 ultimately depends. As such, it is respectfully submitted that the combination of Reiners and Koseki et al. does not render unpatentable claim 18, which ultimately depends from claim 14.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

#### **IV. Rejection of Claim 23 Under 35 U.S.C. § 103(a)**

Claim 23 was rejected under 35 U.S.C. § 103(a) as unpatentable over Reiners. As an initial matter, claim 23 has been canceled herein without prejudice, thereby rendering moot the present rejection with respect to claim 23. Since the features of canceled claim 23 have been included in claim 14, as presented, the present rejection will be addressed with respect to claim 14. It is respectfully submitted that Reiners does not render unpatentable the presently pending claim for at least the following reasons.

The Office Action asserts that the feature that at least two fuel-line arrays are hydraulically positioned in parallel “would have been obvious to one of ordinary skill in the art given the application of the teaching of Reiners to conventionally known engine configurations such as a V-8.” (Office Action, pp. 5 to 6). However, according to Reiners, it is provided only to have separately branched supply and return lines for each injector. (Reiners, col. 4, lines 44 to 56). Nowhere has the Office Action shown that Reiners even refers to the feature that at least two fuel-line arrays are hydraulically positioned in parallel. Therefore, Reiners does not disclose, or even suggest, the feature that *at least two fuel-line arrays are hydraulically positioned in parallel*, as provided for in the context of claim 14, as presented.

Accordingly, it is respectfully submitted that Reiners does not disclose, or even suggest, all of the features included in claim 14, as presented. As such, it is respectfully submitted that Reiners does not render unpatentable claim 14.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

**V. Rejection of Claim 23 Under 35 U.S.C. § 103(a)**

Claim 23 was rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Reiners and U.S. Patent No. 6,810,546 (“Smith”). As an initial matter, claim 23 has been canceled herein without prejudice, thereby rendering moot the present rejection with respect to claim 23. Since the features of canceled claim 23 have been included in claim 14, as presented, the present rejection will be addressed with respect to claim 14. It is respectfully submitted that the combination of Reiners and Smith does not render unpatentable the presently pending claim for at least the following reasons.

As more fully set forth above, Reiners does not disclose, or even suggest, the feature that at least two fuel-line arrays are hydraulically positioned in parallel, as provided for in the context of claim 14, as presented. The Office Action asserts that “[a] person of ordinary skill in the art would naturally run parallel fuel lines for the invention of Reiners if using a dual injector system as set forth in Smith.” However, Smith merely indicates conventional fuel supply lines, in which separately branched lines (207, 208, 307, 308, 533, 534, 539, 540) are connected to each injector. (Smith, col. 4, lines 39 to 57; and Figures 8 to 10). Thus, Smith does not even refer to a single fuel-line array of at least two fuel lines hydraulically connected in series, in which the fuel-line array supplies fuel to at least two fuel injectors. Therefore, Smith also does not disclose, or even suggest, the feature that at least two fuel-line arrays are hydraulically positioned in parallel, as provided for in the context of claim 14, as presented.

Accordingly, it is respectfully submitted that the combination of Reiners and Smith does not disclose, or even suggest, all of the features included in claim 14, as presented. As such, it is respectfully submitted that the combination of Reiners and Smith does not render unpatentable claim 14.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

## **VI. Rejection of Claim 26 Under 35 U.S.C. § 103(a)**

Claim 26 was rejected under 35 U.S.C. § 103(a) as unpatentable over Reiners. It is respectfully submitted that Reiners does not render unpatentable the presently pending claim for at least the following reasons.

Claim 26 ultimately depends from claim 14, as presented. As more fully set forth above, Reiners does not disclose, or even suggest, the feature that *at least two fuel-line arrays are hydraulically positioned in parallel*.

Accordingly, it is respectfully submitted that Reiners does not disclose, or even suggest, all of the features included in claim 14, from which claim 26 ultimately depends. As such, it is respectfully submitted that Reiners does not render unpatentable claim 26, which ultimately depends from claim 14.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

## **VII. Rejection of Claims 14 to 26 Under 35 U.S.C. § 103(a)**

Claims 14 to 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over the combination of Reiners and Koseki et al. As an initial matter, claims 21 and 23 have been canceled herein without prejudice, thereby rendering moot the present rejection with respect to claims 21 and 23. It is respectfully submitted that the combination of Reiners and Koseki et al. does not render unpatentable the presently pending claims for at least the following reasons.

As more fully set forth above, Reiners does not disclose, or even suggest, the feature that at least two fuel-line arrays are hydraulically positioned in parallel, as provided for in the context of claim 14, as presented. Further, as more fully set forth above, since all the Figures of Koseki et al. merely indicate a single delivery pipe (2A to 2G), Koseki et al. also do not disclose, or even suggest, the feature that *at least two fuel-line arrays are hydraulically positioned in parallel* and thus, fail to cure this critical deficiency.

Accordingly, it is respectfully submitted that the combination of Reiners and Koseki et al. does not disclose, or even suggest, all of the features included in claim 14, as presented. As such, it is respectfully submitted that the combination of Reiners and Koseki et al. does not render unpatentable claim 14.

As for claims 15 to 20, 22, and 24 to 26, which ultimately depend from and therefore include all of the features included in claim 14, it is respectfully

submitted that the combination of Reiners and Koseki et al. does not render unpatentable these dependent claims for at least the same reasons more fully set forth above.

In view of all of the foregoing, withdrawal of this rejection is respectfully requested.

**VIII. Conclusion**

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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